April 4, 2005

Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re: In the Matter of Unlicensed Operation in the 3650-3700 MHz, ET Docket No. 04-151; Additional Spectrum for Unlicensed Devices below 900 MHz and the 3 GHz Band, ET Docket No. 02-380; and Amendment of the Commission's Rules with Regard to the 3650-3700 MHz Government Transfer Band, ET Docket No. 98-237.

On April, 2005, Duane Buddrius representing Alvarion, Mariana Goldhamer representing the IEEE 802.16 LE task group and Patrick Leary representing the WiMAX regulatory work group (with permission) met with approximately 15 members of the OET and WTB in an open presentation session. The purpose of the discussion and presentations were to gain understanding of the FCC's intent of the contention based requirement as well as to inform the FCC of issues related to such requirement. These issues stem around the abilities of next generation wireless broadband systems being able to offer the QoS being demanded by the market in order to compete with wire based solutions, and yet still be cognizant of other wireless systems and share the spectrum. The Power Point Presentations provided as attachment to this filing detail these discussion points from the perspective of a vendor, standards organization, and industry forum in order to offer the broadest view of the problems and possible technical solutions. No specific position was taken as part of this meeting, just open discussion for better understanding.

Pursuant to Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, hard copy of this submission has been provided to the participants of the meeting. Please contact the undersigned with any questions in connection with this filing.

Sincerely,

/S/

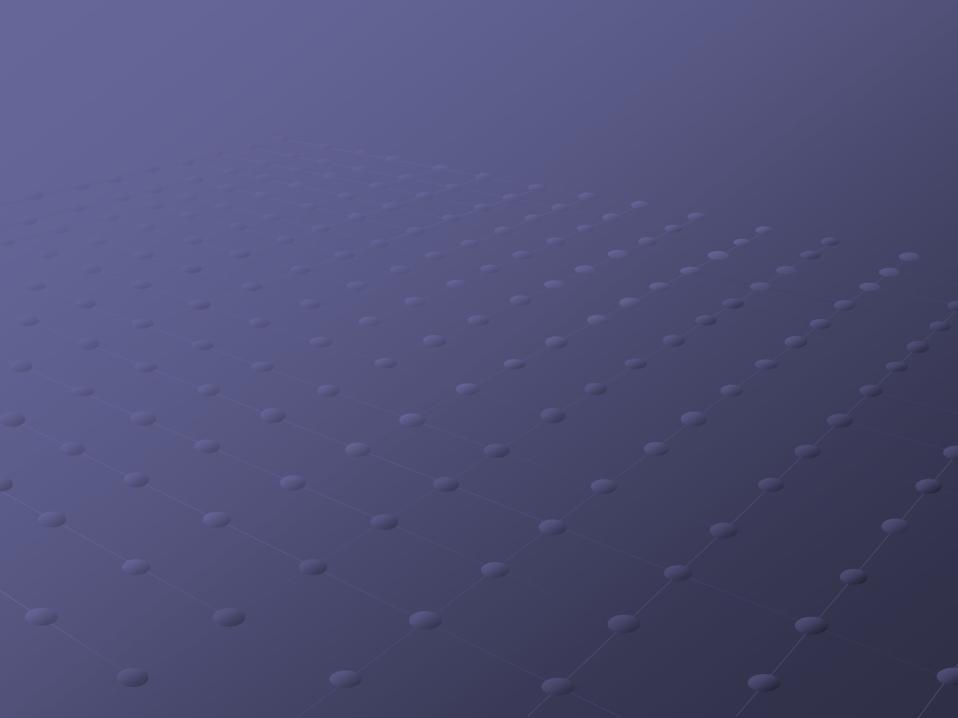
Duane Buddrius Director of Product Engineering & Product Management Alvarion, Inc. 2495 Leghorn Street Mountain View, CA 94043

MEETING WITH FCC APRIL 4, 2005

WiMAX Forum – Patrick Leary

Alvarion - Duane Buddrius

IEEE 802.16h & LE TG - Mariana Goldhamer







FCC 3650-3700MHz Meeting WiMAX Forum Update & Regulatory Positions

Presenter: Patrick Leary, AVP Marketing, Alvarion Date: April 4, 2005



Agenda

- WiMAX Forum Update
- Wireless Broadband Industry Update
- WiMAX Market Opportunity
- WiMAX Operators Demands
- WiMAX Forum Regulatory Vision
- WiMAX View on 3650MHz
- Summary



WiMAX Forum Update

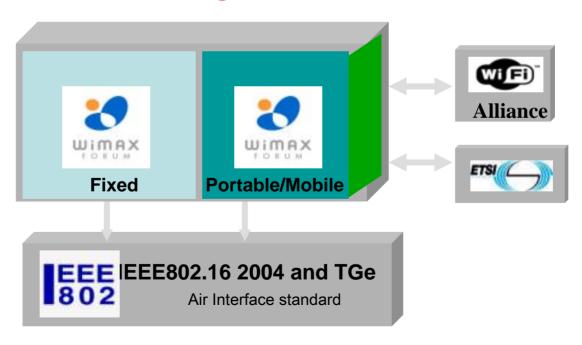
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WiMAX Forum Vision

- Create a global mass market for deployment of broadband wireless networks, that will enable fix, portable and mobile users to maintain high-speed connectivity.
- To lead the "access anywhere" revolution supporting delivery of data, voice and video applications at home, in the office and on the go.





Membership Update

- Approximately 250 members, including global leading companies along every link in the technology/telecom supply chain:
 - E.g. Intel, Samsung, Sanyo, Cisco, Dell,
 Juniper, Lucent, Alcatel, Nokia, Alvarion,
 Motorola, ZTE, AT&T, SBC, British Telecom,
 France Telecom, Deutsche Telecom, Time
 Warner Telecom, The Walt Disney Company



Certification Update

- CETECOM in Spain chosen as the first lab site for certification testing.
- Currently finishing testing protocols and lab customization for WiMAX.
- On schedule for late June/early July "plugfest" testing.
- Alvarion, Airspan, and Redline announced pre-certification interoperability testing.
- Intel Rosedale chip nearing commercial production.



What Equipment Does Certification Cover?

- Certification provided to equipment (Base Station and Subscriber or CPE), not to components (silicon, RF, software...)
- Certified equipment can use "WiMAX Forum CERTIFIED" text and logo
- "WiMAX Forum CERTIFIED" is Trademarked





WiMAX Interoperability

- Based upon market requirements, reduce the breadth of the standard so that baseline interoperability can be achieved between vendors
 - Multi-vendor process to create Certification tests
 - Based upon ISO/IEC 9646 process
- Cetecom Spain is the official certification laboratory (many branch labs around the world)
- Equivalent in purpose to Wi-Fi Alliance* for 802.11 or Cablelabs* for DOCSIS
- Worldwide recognized WiMAX-Certified stamp of approval



WiMAX Forum Working Groups

- Regulatory Working Group (RWG)
- Service Provider Working Group (SPWG)
- Technical Working Group (TWG)
- Certification Working Group (CWG)
- Marketing Working Group (MWG)
- Applications Working Group (AWG)



Industry Update

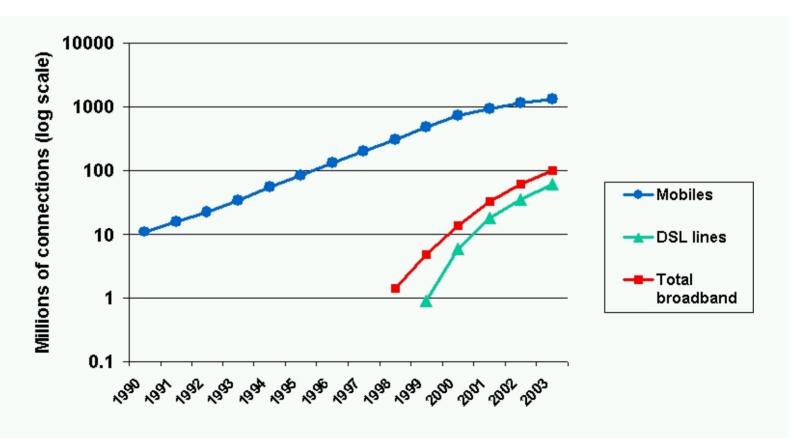
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Worldwide Broadband Market Growth

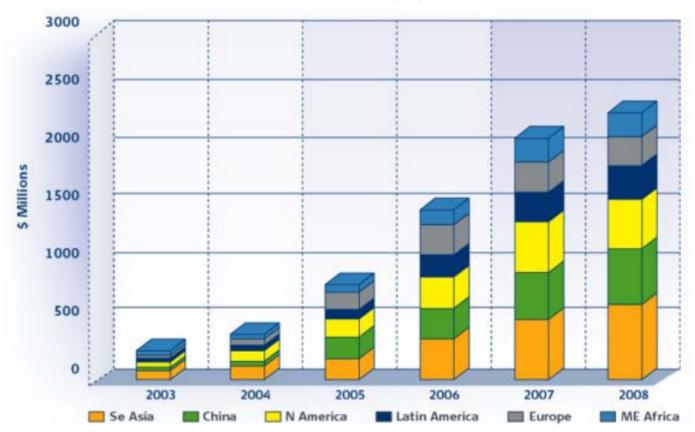
 Broadband Growth rate exceeding Mobile Growth





BWA Market Growth-Fixed Wireless Only

Worldwide Broadband Wireless Equipment Revenue < 10GHz



\$305M in 2003 \rightarrow \$2.9B in 2008 = 5 yr CAGR of 52.2%

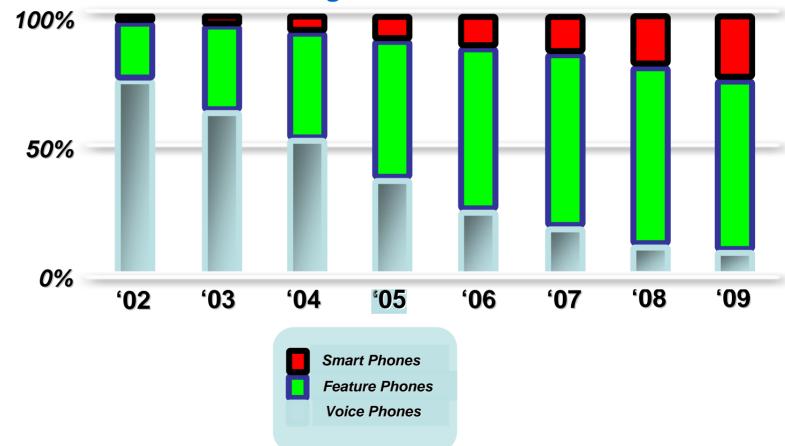
Source: Sky Light Research 2004

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Data-Centric Phone Shipments Overtake Voice-Centric Phones in '05

Voice Revenues Growing at a 4.7% CAGR Data Revenues Growing at a 30.7% CAGR





Wireless Technologies are Complementary

WAN MAN LAN PAN

3G WCDMA GPRS EDGE WiMAX * 802.16 Broadband

Wi-Fi * 802.11

UWB and Bluetooth

RFID/

The Result: Always Best Connected

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WiMAX Market Opportunity

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Network Definitions

Fixed Network

 Client devices are stationary and cannot transplant to different cell without operator reconfiguration.

Portable Network:

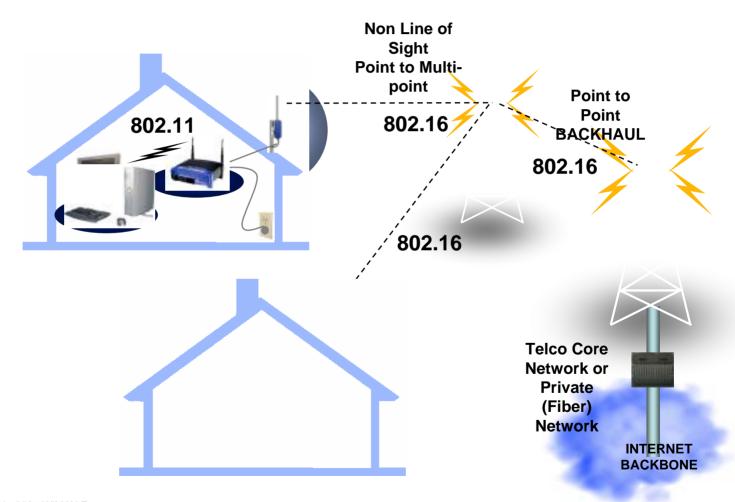
 Portable operation is an enhancement over basic fixed indoor/outdoor operation enabling access from multiple network access points but without seamless mobility. (Break before Make)

Mobile Network:

 "...support low packet loss handovers and handover latencies to support applications such as near toll-quality VoIP. (Make before Break)



2005 Deployments Fixed ACCESS With True QoS

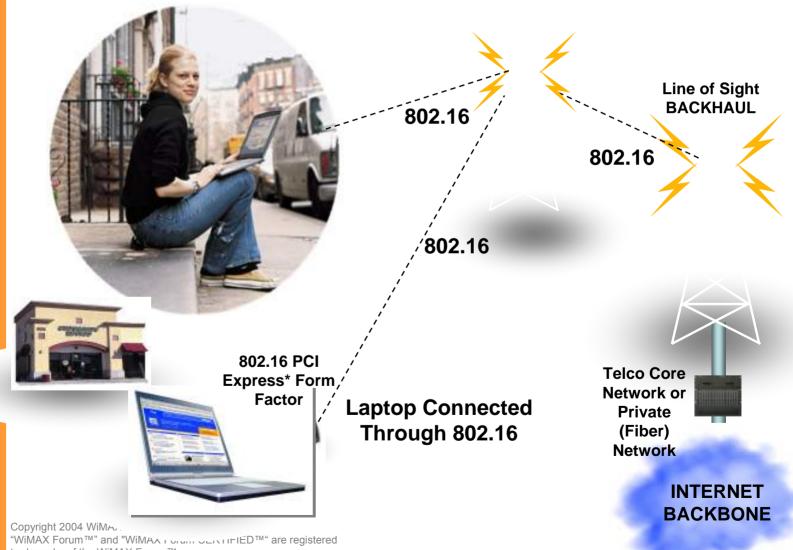


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2006 - 2007: Portable/Mobile **WiMAX Certified Broadband**



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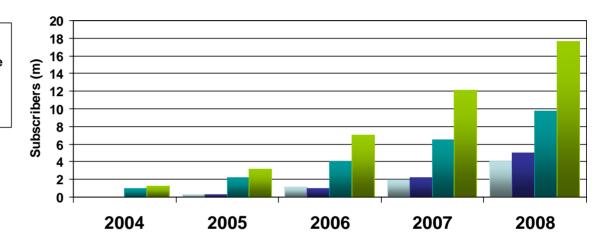
Industry View of WiMAX Potential

802.16 Fixed Indoor/Outdoor Wireless Subscriber Forecast



- ABI Research- Aggressive
- Visant- Moderate*
- Visant- Aggressive*

Source: ABI Research, 2003 Visant Strategies, 2003



Main Takeaway:

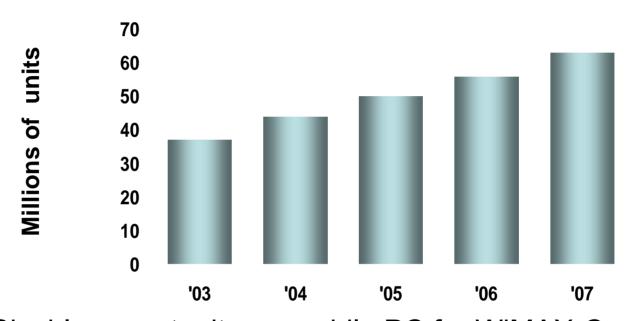
- New Market variations between analysts forecasts
- Upside for 802.16e (laptop integration) not captured

Copyright 2004 WiMAX Forum



Mobile Device Potential

Mobile PC Shipments: 2003- 2007

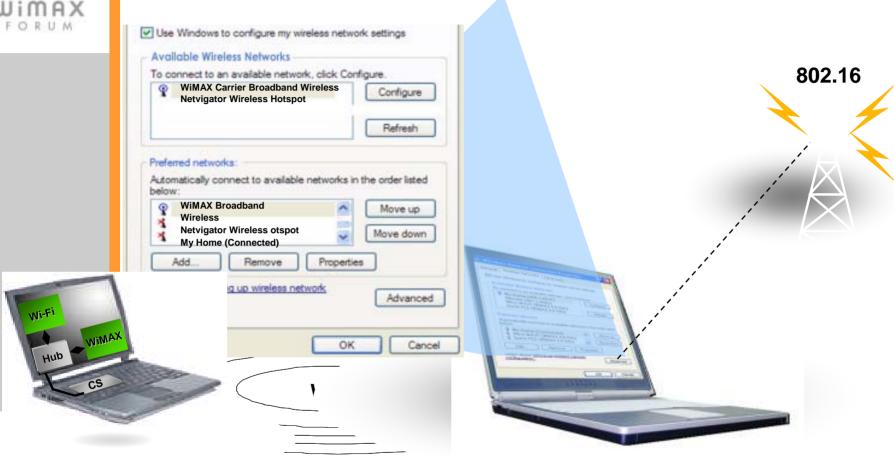


- Sizable opportunity on mobile PC for WiMAX-Certified products
- Example: a 20% attach rate to mobile in '07 doubles the most aggressive analyst forecast for 802.16 clients in that time period

Source: IDC 10/03



WiMAX and Wi-Fi in the Laptop



Laptop Add-In Card Target Features:

- PCI Express* Form Factor w/ Simplified Network Connection software
- Integrated Lid Antenna

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Estimated 2007 – 2008 Mobile Wireless Data Access Networks

GSM, CDMA



Always Best Connected

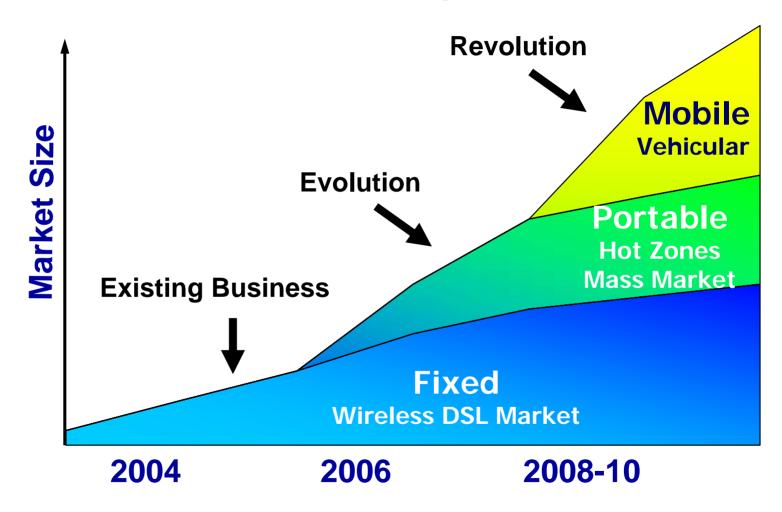


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Broadband Wireless Market Road Map



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The WiMAX Roadmap

2004

Going Forward

Fixed Outdoor

Solution Characteristics

- Fixed location
- Installed outside of subscriber's house
- Requires truck roll

Applications

- E1/T1 Level Service for Enterprises
- Backhaul for Hotspots
- Fractional E1/T1 for SM
- Limited residential broadband access (early adopters, rural, developing countries)



Fixed Indoor

Solution Characteristics

- Consumer self install, auto provisioning
- Portable can 'move'
 CPE to another location in service area

Applications

- "Last Mile" Broadband access for consumers
- Portable broa access



Mobility

Solution Characteristics

- CPE Native in Mobile PC
- User can roam within the service area at varying speeds

Applications

- "Mobile" Broadband access for consumers
- Always Best Connected (SNS)



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WiMAX Operators Demands

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WiMAX Service Provider Types

Dominant national operator Incumbent Fixed Operators with access & backbone (ILEC) infrastructure **ILEC** expanding into new **Competitive Local Loop** region or start-up operator **Operators (or CLEC)** Wireless ISPs (WISPs) **Regional Internet Provider** Dense mobile network **Mobile Operators** operator **Enterprise / Public Safety** Vertical applications

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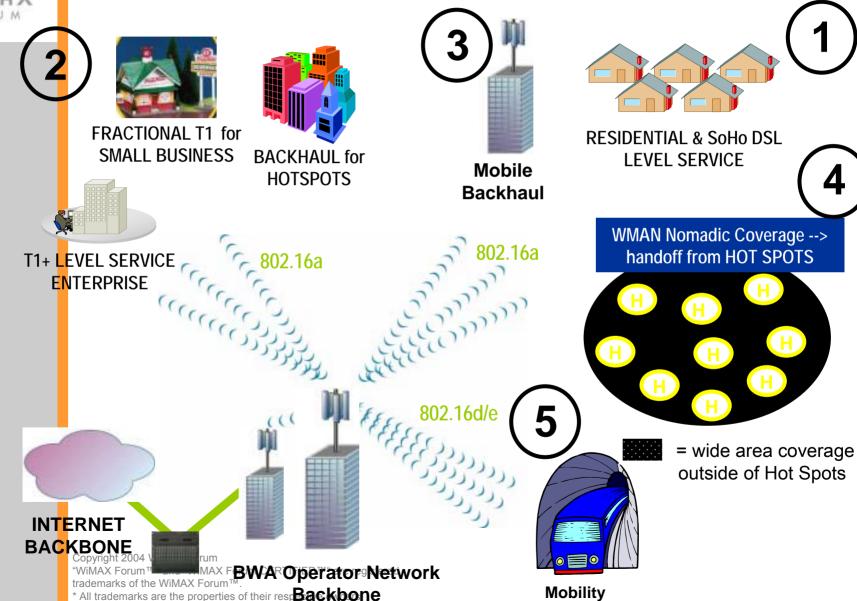


Operators Are Looking For:

- Maximize spectrum utilization
 - Spectrum is limited and may be costly
- Minimize number of base stations to cover targeted geographic area
 - Maximize range, minimize deployment cost
- Meet or exceed customer requirements and expectations for data rate, etc.
 - Meet a predetermined data density
- QoS is mandatory to enable differentiation in an all IP environment
- Competitive added value services



WiMAX Market Vision: Broadband Everywhere





WiMAX Forum Regulatory Vision



RWG Charter

- Harmonize existing and new spectrum make it "WiMAX friendly"
- Advocate policies to ensure costeffective equipment
- Create an environment to support global roaming for portable and mobile WiMAX devices
- Support policies to ensure consistent end user experiences



RWG Goals

- Harmonize spectrum for initial Forum certification profiles
 - 2.5-2.7 GHz licensed: US, Brazil, Mexico, Philippines today
 - GLOBALIZE via IMT-2000 efforts
 - 3.4-3.6 GHz licensed
 - Ensure nomadic use allowed in Fixed Wireless allocations and support for flexible channelization
 - 5 GHz license exempt
 - Widen adoption of 5.8 GHz in Europe; drive for 4W EIRP globally in 5.8 GHz; widen global adoption of mid-band
- Influence regulators as they consider new bands for fixed and mobile services
 - e.g., 2.3-2.4 GHz, 3.3-3.4 GHz; 3.6-3.8 GHz; sub 1 GHz
- Build awareness for WiMAX among world & regional bodies and influence recommendations
 - Presence at world & regional body meetings: ITU-R, CEPT, APT WF, CITEL, FCC



Regulatory Vision

- Push for global harmonization of rules to foster economies of scale.
- Support for new bands, especially sub-1GHz.
- Encourage regulation that will enable technical ability to support high QoS products being demanded by the market place (Note: Here is where 802.11 falls short, see next slide.).



Comparing Standards 802.11 vs. 802.16

	802.11a	802.11b	802.11g	802.16d
Peak Data Rate	54Mbps	11Mbps	54Mbps	75Mbps
Frequency Band(s)	5GHz	2.4GHz	2.4GHz	2-66GHz
Range	50m	100m	100m	50km
Channel Size(s)	20 MHz	20 MHz	20 MHz	1.5-20MHz
Spectral Efficiency	2.7bps/Hz	0.6bps/Hz	2.7bps/Hz	5bps/Hz
Modulation ¹	OFDM	DSSS	OFDM	OFDM
Quality of Service	No	No	No	Yes
IEEE Certification	1999	1999	2003	2004E



Potential WiMAX Channel Plans

Profile	Band	Channel BW*	Duplex	License
700 ¹	Upper 700 MHz Band	5 MHz	TDD	Yes
2.3T1 ¹	WCS Band	5 MHz	TDD	Yes
2.5T1	BRS-EBS Band	5 MHz	TDD	Yes
3.5T1	3.5 GHz Band	7 MHz	TDD	Yes
3.5F1	3.5 GHz Band	3.5 MHz	FDD	Yes
5.8T1	5.8 GHz ISM/UNII	10 MHz	TDD	No

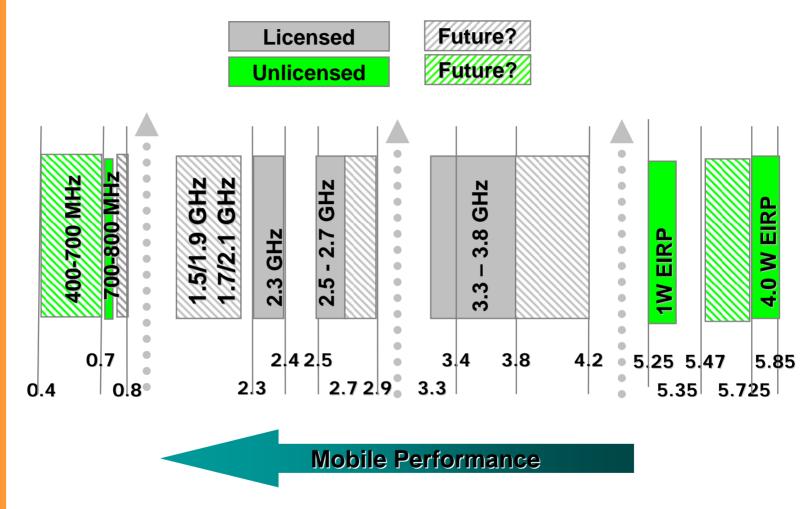
¹ future potential WiMAX bands & channels

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< 6 GHz Spectrum for Possible WiMAX Use



* Pockets of indicated spectrum are available in various countries



WiMAX View on 3650MHz

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"Co-Existence Based"

- Official publicized view is TBD, however WiMAX Forum will file comments requesting the FCC alter the R&O language from "contentionbased" protocol to "co-existence based" protocol.
 - This will accomplish exactly the intent of the rule without overlaying a SPECIFIC technical requirement (e.g. contention based) that forces the industry to institutionalize a specific technical component, namely an old protocol. (This runs contrary to recent trends of FCC rules that try to encourage innovation and resists naming specific technical mechanisms.)
 - The term "co-existence" is broader in that it allows for innovation of new and better protocols that can better adapt to interference, provide for more efficient use, foster better band sharing, enable better operator scaling, and support the levels of QoS being demanded by end customers.



Note on System Profile Creation

- While it is true that Intel's position on 3650MHz is that it should be licensed and they claim they will not support and unlicensed 3650MHz, the WiMAX Forum charter allows for creation of a system profile for a new band if at least three principal members.
- Already, at least 4 principal members have the intention of using 3650-3700MHz, so creation of a profile can be supported by the WiMAX Forum.



Summary

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Summary

- WiMAX technology has broad support of key members across the entire telecom landscape.
- The market potential for WiMAX is real.
- The industry is trending toward and all IP, converged future. Such requires strong QoS to differentiate the distinct applications.
- Contention-based protocols inherently do not enable good QoS.
- Changing the language to "co-existence" preserves the FCC intentions for 3650MHz while supporting innovation and much better levels of service to the end customer.









Alvarion Position on 3650 MHz Band









Meeting with FCC April 4, 2005

By Duane Buddrius, Director Product Engineering and Product Management

Contents



Alvarion at a Glance

Global Wireless Broadband Market

The Next Generation High-Speed Broadband Access

• Alvarion Brings BreezeMAX

Issues with the 3650MHz Band Rules













Alvarion Snapshot



- The worldwide leader in wireless broadband with over 2,000,000 units installed
- U.S. leader among telcos, utilities, rural cellular carriers, municipalities, & mobile public safety
- Installations in over 130 countries
- Over 5,000 U.S. towns and cities covered
- Strong OEM channels with Siemens, Alcatel, Nera & Datang
- Working with more than 200 partners
- 2004 revenues \$201.5M 36.5% growth over 2003
- About 700 employees (over 250 R&D engineers)
- Financially strong, profitable with \$133M cash reserves, NASDAQ: ALVR
- Pioneering leader in standards development since first 802.11 standard
- Leader in WiMAX Forum™
- Acquired Interwave for \$56M cash; Specialized GSM and CDMA base stations











Alvarion Wireless Broadband Solutions















BreezeNET

MGW / eMGW





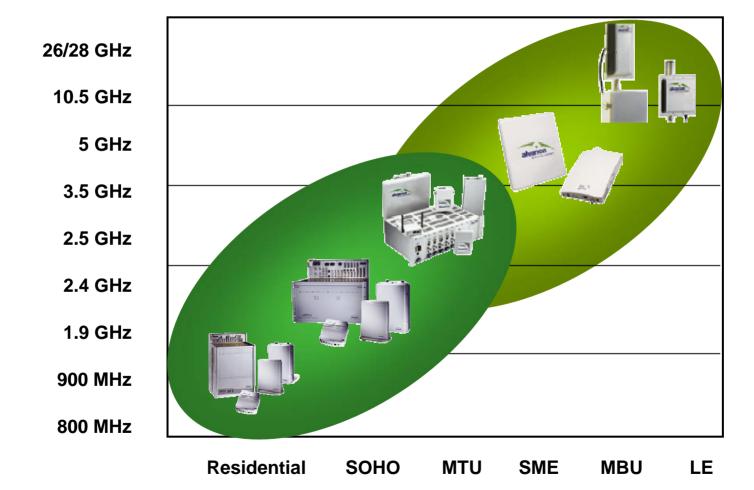






All Major Global Frequencies Supported









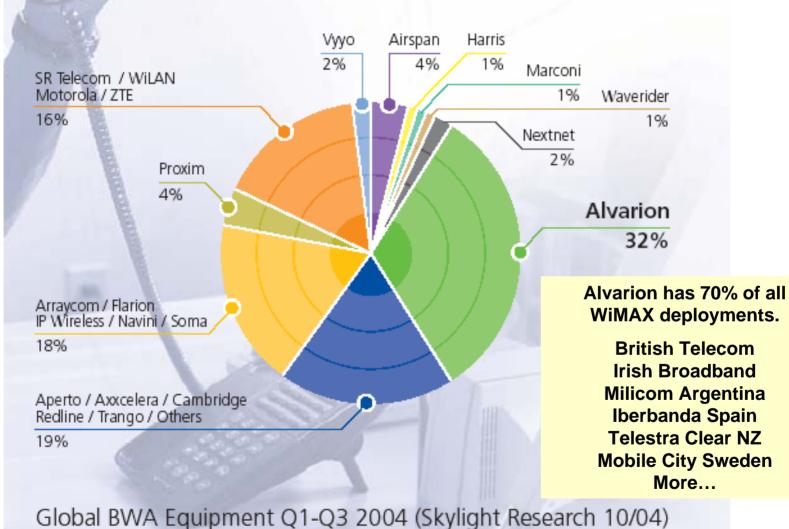






Global Leadership















Alvarion Global Presence





Alvarion Industry Leadership



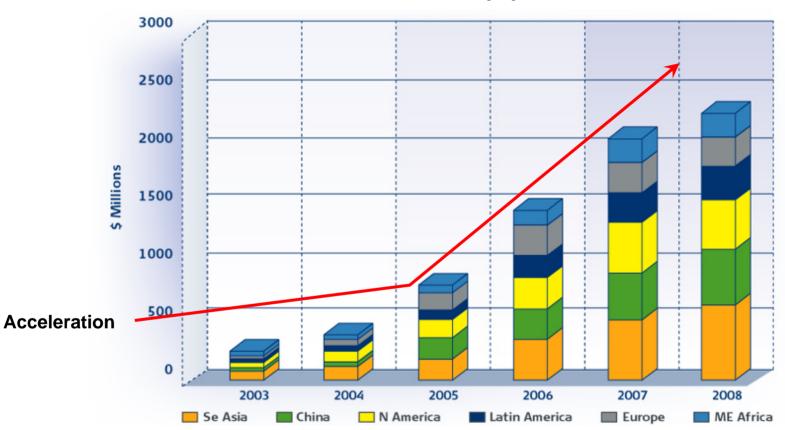
- WiMAX
 - Vice President
- ETSI BRAN HiperMAN
 - Chair
- Wireless Communications Assoc. (WCA)
 - Board member
 - Executive Committee, License Exempt Alliance
 - Foster WW growth of wireless broadband systems over license exempt spectrum
 - Ohair, BWA Task Force for Mobile Operators
- IEEE 802.16d
 - Participating in the definition of profiles for 802.16a
- IEEE 802.16e
 - Participating in the drafting of mobile PHY / MAC features
- IEEE 802.16h License Exempt Task Group & Coexistence Protocols
 - Chair position



Global Growth of Wireless Broadband



Worldwide Broadband Wireless Equipment Revenue < 10GHz



\$305M in 2003 \rightarrow \$2.9B in 2008 = 5 yr CAGR of 52.2%

Source: Sky Light Research 2004





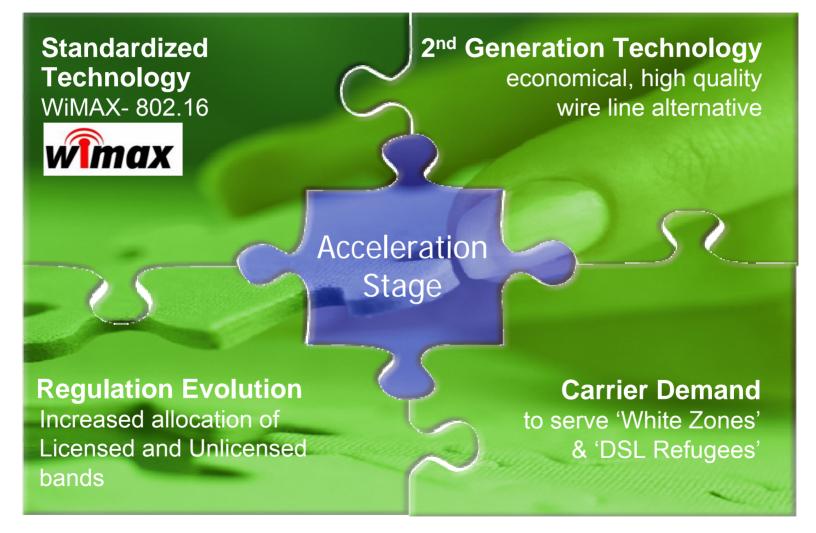






Key Success Drivers

















3

The Next Generation High-Speed Broadband Access

Service Provider Requirements



Operator Requirements

WiMAX addresses by ...

True Broadband Speeds

...delivering > 1 Mbps per user (DSL business model)

NLOS Operations

...providing strong multipath protection (indoor self install)

High Link Budget

...enabling >150-160 dB of link budget

High Number of Simultaneous Sessions

...offering 100's simultaneous sessions per channel

Courtesy of the WiMAX Forum, March 2004













Service Provider Requirements (cont.)



High Spectral Efficiency

...giving >3.8 bps/Hz in 64QAM mode w/ cell radius >50 km in QPSK

Large, Globally Unified **Channel Bandwidth**

...making 1.5 and 20 MHz channel plans match with worldwide regulatory regimes.

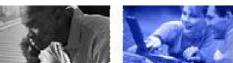
Low Latency

...meeting operator requirements for voice, video and data applications

IP Quality of Service

...granting full Class, Service, **Protocol and Application based** differentiation can be provided for Layer 3 – Layer 7 protocols











WiMAX Benefits Everyone



- Component makers
 - Standard based on IEEE 802.16-2004
 - Global Harmonization common spectrum allocations and operational rules
 - Creates a volume opportunity for silicon suppliers
- Equipment makers
 - No longer need to develop every piece of the end-to-end solution
 - Can innovate more rapidly
- Operators
 - Multiple equipment suppliers and lower costs = lower investment risk
 - Generate revenue by filling broadband access gaps
 - Quickly provision T1+ level and "on demand" high margin broadband services
- Consumers
 - More choices for getting broadband access













Alvarion Brings BreezeMAX

Alvarion's BreezeMAX



- The industy's first WiMAX-ready system built from the ground up to support WiMAX Forum™ profiles.
- Alvarion's 4th generation OFDM solution incorporating our 12 years of market leading technical expertise and deployment experience.









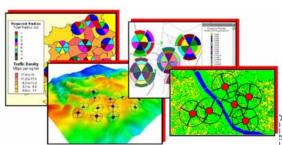


BreezeMAX - Highlights

- Multiple Backbone types
 - 100BaseT/GigE and ATM data network interfaces
 - GR-303 TDM interfaces to Local Exchange (16 x T1)
- Multiple RF unit configurations
 - Multiple sectors per base station
 - Multiple channels per outdoor unit
 - Multiple antennas per sector (smart antenna technology)
- Comprehensive family of CPE
 - Data only
 - Data + 2 Voice Ports
 - Enterprise CPE bridge with integrated 802.11g Wi-Fi
- Resource management for packet and circuit switching
 - PSTN call processing
 - Voice Processing: echo canceling, fax/modem detection
 - Bandwidth and SLA management
- Interfacing to the NMS: monitoring, alarm, configuration











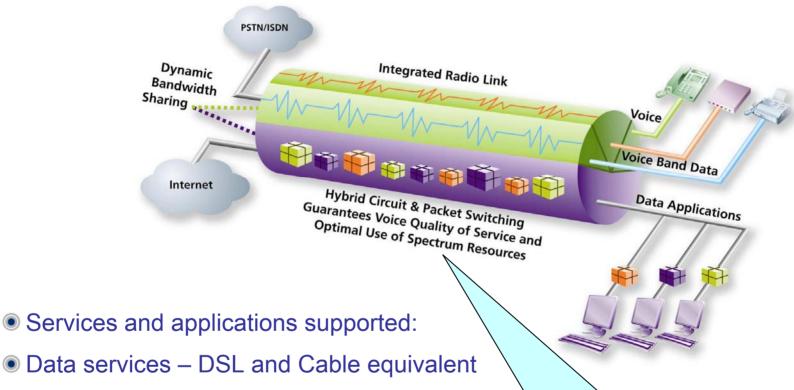






BreezeMAX Services





Voice services – true TDM or VoIP

Leased line services – E1/T1

• Layer 3 IP VPN services

802.16 brings true QoS to TDM and Voice Services. This is designed into the core of the protocol.











Alvarion's WiMAX Vision



Product Availability

2004 →

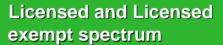
2006 →

 $2007 \rightarrow$

Fixed BWA

- License and **Licensed-exempt Spectrum:** 2GHz - 6GHz
- Fixed outdoor Subscribers
- National Operators, **Competitive Carriers** and ISPs.
- Target subscribers:
 - Residential users
 - Enterprises
- Voice, Data & leased line services

Portable BWA



- Fixed, Self-Installed **CPEs, Portable CPEs**
- Fixed Network Operators, Mobile **Network Operators**, **Competitive Carriers** & ISPs
- Target subscribers:
 - Residential users
 - Enterprises
 - Business users
- Voice & Data services

Mobile BWA

- Licensed spectrum
- Mobile Subscribers
 - PCMCIA cards
 - Embedded WiMAX chip (Notebooks, PDAs)
- Fixed Network Operators, Mobile **Network Operators & Competitive Carriers**
- •Target subscribers:
 - Residential users
 - Business users
- Voice & Data Services





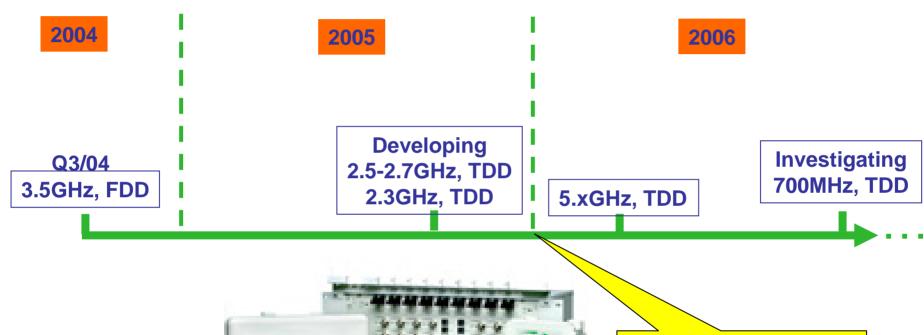






BreezeMAX Frequencies Road Map





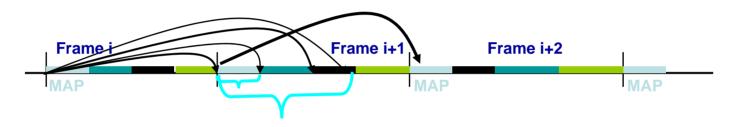
alvarion

Can the new 3650MHz band be on the BreezeMAX road map?

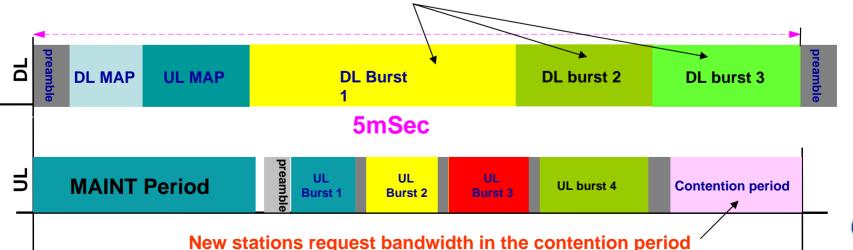
How does WiMAX control traffic and QoS?



- Connection based traffic classifications;
 Real Time Variable Rate, Non Real Time Variable Rate, Best Effort
- The 802.16 protocol is TDM. The map header describes the next frame.
- The MAP which is transmitted in frame{i+1} is planned during frame{i} and refers to the bursts that will be transmitted on frame{i+2}.



Each burst is defined by PHY parameters such as modulation, coding and each burst starts and ends on an OFDM Slot boundary



BreezeMAX - WiMAX QoS



- You can see that Quality of Service depends on coordination and timing.
- If the MAP header is destroyed, then no station knows what to do.
- If the frames can not be transmitted when they are scheduled, then the "real time services" are no longer real time.
- Without QoS, service providers can not offer competing services to those offered by DSL and Cable.



5

Issues with the 3650MHz Band Rules

Issues with the 3650MHz band rules



1. Requirement for "contention-based" protocol



• What does the FCC specifically mean "contention-based"?

WiMAX – 802.16 is not a contention based protocol.

• What about coexistence rather than contention?









BreezeMAX - WiMAX for 3650MHz?



WiMAX is the industry direction, however:

With a "contention-based" requirement we loose the key benefits of WiMAX which are service provider requirements.

- The FCC rules are not in harmony with 802.16 or WiMAX.
- Further protocol development will be required with the unfortunate effect of delaying product availability.









For Future Spectrum Releases



FCC already works to harmonize with global spectrum allocations

FCC has made huge strides in making spectrum available on shared basis

- Harmonize with Industry standards
 - Smarter methods of sharing the bands without losses in efficiency

Support 802.16 efforts on coexistence











IEEE P802.16h and 3.65GHz band



MEMBER





Mariana Goldhamer

IEEE 802.16 LE TG (802.16h) Chair

Director Strategic Technologies - Alvarion

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Contents



- Meeting Objectives
 - Present the limitations of "contention based" protocols
 - Present a non-802.11 Wi-Fi and 802.16
- Inter-system coexistence based on CCA and contentions
- P802.16h possible solutions in the context of 3.65GHz R&O
- Conclusion and next steps
- Back-up slides

IEEE Project 802.16h – Amendment to IEEE Std. 802.16-2004



Scope

To specify improved mechanisms, as policies and MAC enhancements, to enable coexistence among license-exempt systems based on IEEE Standard 802.16 and to facilitate the coexistence of such systems with primary users

Applicability

- Un-coordinated operation in all bands in which 802.16-2004 is applicable
- Market problem to resolve
 - No service guarantee in LE bands
 - No minimum data rate and QoS guarantee
 - Bad spectral efficiency
 - Low cell size
 - Operator lack of confidence in deployment business model
 - More info: http://ieee.802.org/16/le

Service aspects of 802.16 vs. 802.11



High spectral efficiency

- 802.16: MAP field (few bytes) for every scheduled transmission
- 802.11: 2 supplementary messages for every transmission
 - RTS (Request to Send) and CTS (Clear to Send)

QoS

- 802.16: scheduled transmission, guarantees QoS
- 802.11: contention-based protocol, no QoS guarantee; Clear Channel Assessment (CCA) is done at transmitter location and the interference is experienced at RECEIVER location; 500m distance may introduce between them >100dB isolation

Capacity at high offered traffic load

- 802.16: insignificant degradation
- 802.11: totally collapses at high requested traffic due to contentions: the retransmission overhead may be higher than the traffic itself!

Cell size

- 802.16: up-link sub-channelization/OFDMA gives up to 15dB more
 - 2...4 times higher as compared with 802.11, NO contentions
- 802.11: limited by time constants and contentions
 - Needs very high C/(N+I) even for low modulation orders: Clear Channel Assessment is done at transmitter location and the interference is experienced at RECEIVER location
 - In large BWA networks there are long distances and all the process may not work well

Inter-system coexistence solutions



- © CSMA/CA and "Clear Channel Assessment" before transmissions
 - Incompatible with the scheduled transmissions concept > NOT providing QoS
 - Destroying the high-spectral efficiency concept
 - A scheduled interval for transmission shall include time for other transmissions, even if they do not take place
 - Incompatible with directional antennas
 - Antenna isolation may cause CPE to be hidden from each other
 - Creating interference to neighbor CPE
 - A CPE may not "see" a foreign Base Station transmission to a neighboring CPE belonging to that network and thus may transmit at times when the neighbor CPE is in Receive state
 - Does not prevents the interference at RECEIVER location

Directions for solution



Separation in frequency

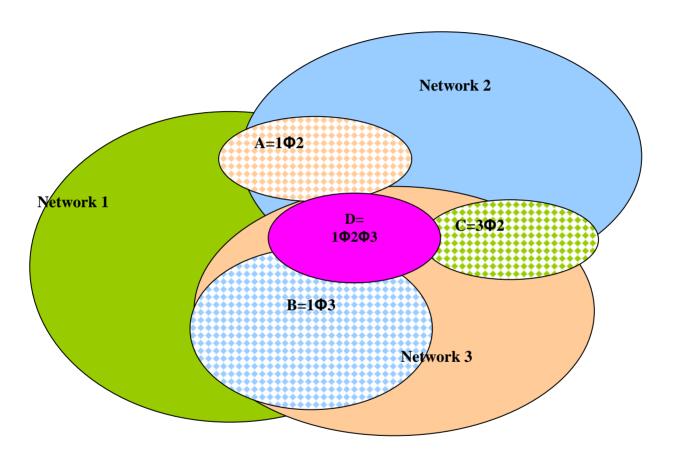
- May not be possible in all the locations
 - Adjacent and 2nd adjacent channel interference
 - Radio front-end saturation
 - Lack of Tx/Rx synchronization

Separation in time

- Provides for guaranteed minimum traffic
- Allows mixing of different technologies

Separation in time - example





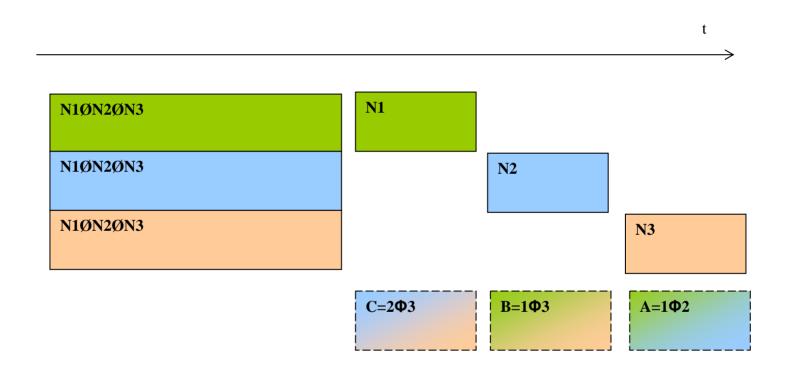
Legend:

Network i

Sub-network j, k not interfering with Network i

...And possible traffic scheduling





Conclusion:

Every system may use 100% of spectrum, with interference avoidance!!!

Scheduling in context of 802.16 – MAC frame

N3



Owner of the Radio Resource:

N1 N2 N3

N1 ØN2 ØN3

N2 ØN1 ØN3

ØN1 ØN3

ØN1

 \leftarrow Tx

ØN2

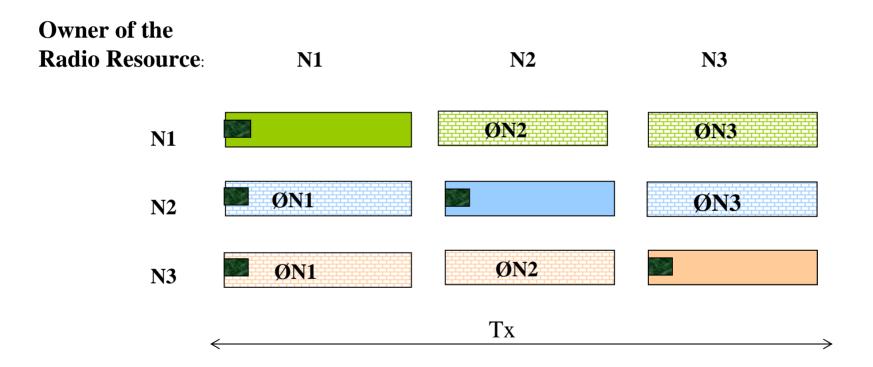
MAP

ØN1

ØN2

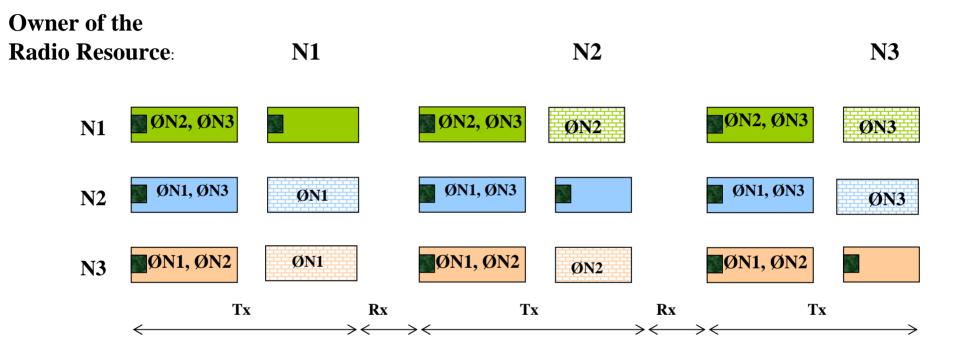
Scheduling in context of 802.16 – MAC frame, alternative approach





Scheduling in context of 802.16 – repetitive MAC Frame





Advantage: Easier management of time resource

PART 90 – PRIVATE LAND MOBILE RADIO SERVICES - Subpart Z – 3650 MHz alvario



- Requirement for a Coexistence protocol
 - 802.16h fits the definition
 - A protocol that allows multiple users to share the same spectrum by defining the events that must occur when two or more transmitters attempt to simultaneously access the same channel and establishing rules by which a transmitter provides reasonable opportunities for other transmitters to operate
 - The term "contention-based" protocol is too suggestive of a particular solution and is NOT technology neutral:
 - FCC should change the name to "coexistence protocol"
- Introduces a "Base-Station" data base
 - Neighborhood Base Stations may be identified
 - Adding an IP identifier (as <u>BS007@winet.com</u>) will enable dynamic radio resource sharing, using BS to BS communication.
 - Service providers are identified
- Includes obligation of the licensees to collaborate and avoid harmful interference
 - Using the same coexistence protocol may satisfy this obligation

Protocol proposal in the context of Part Z – 3.65 GHz



- Starting from the FCC Operators' Base Stations data base
 - Establish the number of operators in a given area
 - Establish the MAC frame division in time
- Establish interferer identification
 - © Create a multi-frame, every transmitter having a short slot for its sole transmission
 - Identify the transmitter based on frame number and slot number and/or GPS time
- Establish messages for dynamic radio resource allocation
 - Affect the duration of reserved slots, based on agreement between the networks involved
 - If one network experiences low interference, may let other networks to increase the time in which they work in parallel
 - If one network experiences interference, may ask other networks
 - Specific transmitters to cease the operation in parallel
 - Increase its reservation time and define the new time

Protocol proposal in the context of Part Z – 3.65 GHz, protocol proposal – (cont.)



- Establish rules of behavior based on:
 - actual traffic load
 - actual interference levels and duration
 - To be a basis for "type approval"
 - Avoid stealing radio resource

Highlights of the proposed protocol



- Technology agnostic
 - The communication between base stations takes place at IP level
 - The IP identifier should be known from the FCC data base
 - Multi-frame definition will be based on a general time-base (seconds)
 - Every network will have its allocation for:
 - High transmitting powers
 - Interference-free reception
 - May accommodate
 - WiMAX systems
 - Bursty systems
 - Mesh systems
- High spectral efficiency and QoS
 - Scheduled approach
 - Suitable for WiMAX applications
- Large cell size
 - Minimization of interference
- Enforces fairness and collaboration

Proposed protocol - conclusion



- FCC feedback needed
- May be a basis for "type approval", if supported by WiMAX Forum
 - Large enough industry consensus
- However:
 - The coexistence problem remains, if different and incompatible protocols will be accepted by FCC
 - Operator lack of confidence in using the band
 - Building the industry consensus on one single protocol may require many years
 - Delay the market
 - Will 802.16h proposals become "de facto" protocol ?

Other protocols



- © Contention-based protocols (IEEE 802.11)
 - Destroy the QoS
 - Decrease significantly the spectral efficiency
 - Not optimal for WISP market
- ETSI BRAN HiperMAN
 - Highly harmonized with IEEE 802.16
 - On-going strong cooperation
- ETSI BRAN System Reference Document for Fixed-Nomadic BWA
 - Mention 802.16h work on inter-system coexistence

Conclusion and steps forward



FCC ruling is a revolutionary step for better spectrum usage

- Enforces coexistence based on Base Station data base and protocols
- Provides premises for opening more spectrum in shared bands
- Significantly increases the market
- High potential to be followed world-wide
- Alvarion is committed to contribute

FCC participation in IEEE 802.16h meetings

- Will give timely feedback to 802.16h standard development
- Ofcom-UK and Industry Canada already joined last meeting



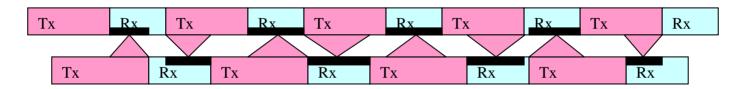
Thank you!

marianna.goldhammer@alvarion.com

Inter-system interference



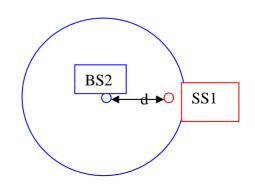
- BS to foreign BS and ST to foreign ST interference problem
 - Generated by TDD environment



Can be mitigated by Tx/Rx synchronization



- BS to foreign ST and ST to foreign BS
 - Exist in both FDD and TDD environments
 - Can conduct to Radio saturation
 - Affect the receive sensitivity level
 - Coordination or Guard band are necessary



BS to ST or ST to BS interference: 2.4GHz, LOS, FCC high power rules



1st Adjacent Channel

2nd Adjacent Channel

RSL degradation (dB) and interference level at BS1, BS2 at x meters	BS Omni, SS Omni		BS Directional SS Directional		BS Directional, SS Omni	
	Level	Delta_	Level	Delta_	Level	Delta_
	(dBm)	RSL	(dBm)	RSL	(dBm)	RSL
50	-28.98	38.02	-21.98	45.02	-28.98	31.02
100	-35.00	32.00	-28.00	39.00	-35.00	25.01
250	-42.96	24.05	-35.96	31.04	-42.96	17.12
500		18.08	-41.98	25.03		11.35
1000		12.26		19.05		6.19
1800		7.70		14.06		2.96
2750		4.90		10.60		
3500		3.60		8.74		
4500				6.92		
6000				5.06		
8000				3.50		

RSL degradation (dB) and interference level at BS1, BS2 at x meters	BS Omni, SS Omni		BS Directional SS Directional		BS Directional, SS Omni	
TRECES .	Level (dBm)	Delta_ RSL	Level (dBm)	Delta_ RSL	Level (dBm)	Delta_ RSL
50	-28.98	19.07	-21.98	26.03	-28.98	12.28
100	-35.00	13.21	-28.00	20.04	-35.00	6.97
200	-41.02	7.77	-34.02	14.15	-41.02	3.00
450		2.98	-41.07	7.73		
700				4.83		
1000				3.01		

See technical analysis: http://ieee802.org/16/docs/04/C80216-04_14.pdf

IEEE P802.16h - Initial ToC - 1



- Interference detection and prevention general architecture
- Identification of interference victims and sources
 - Identification of the interference situations
 - Identification of spectrum sharers
 - Regulations, messages to disseminate the information, avoidance of falseidentification situations, storage of identification information
- Interference prevention
 - Adaptive Channel Selection ACS
 - Dynamic Frequency Selection DFS
 - Pro-active cognitive approach Signaling to other systems
 - Recognition of other systems
- Inter-system communication
 - Messages
 - Common Management System

IEEE P802.16h - Initial ToC - 2

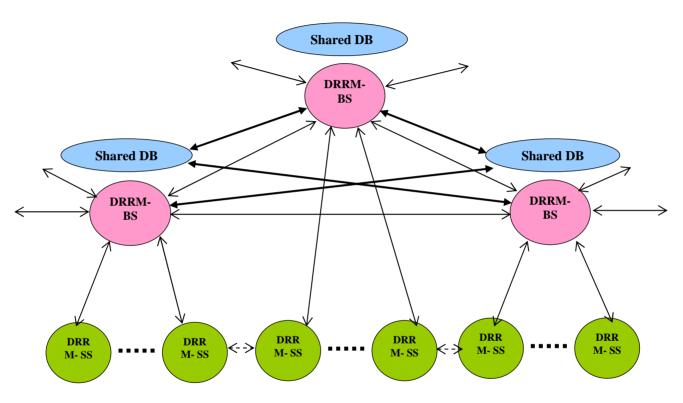


Common policies

- How to select a "free" channel (for ACS and DFS)
 - Acceptable S/(N+I)
 - Acceptable time occupancy
 - Capability of sharing the spectrum to implement a Shared Radio Resource policy
- Interference reduction policies
 - BS synchronization
 - Shared Radio Resource Management
 - Fairness criteria
 - Distributed scheduling, power control, bandwidth control, beam-forming

Initial P802.16h view of network





Inter-BS communication

<----> SS-SS Communication

BS to Shared Data Base Communication

Inter-BS communication

DRMM – Distributed Radio Resource Management

MIB – Management Information Base